

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

DAVID COLLINS, PATRICIA FUIRE,
ELIZABETH MAYFORTH, and ROBERT
ANNAN, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

TOLEDO BLADE COMPANY, PG
PUBLISHING CO., and BLOCK
COMMUNICATIONS, INC.,

Defendants.

Case No. 3:23-cv-302

Judge James G. Carr

STIPULATION TO EXTEND ANSWER DEADLINE

Plaintiffs David Collins, Patricia Fuire, Elizabeth Mayforth, and Robert Annan (“Plaintiffs”) and Defendants The Toledo Blade Company, PG Publishing Company, and Block Communications, Inc. (“Defendants”) (collectively, “the Parties”) hereby stipulate as follows:

WHEREAS, Plaintiffs filed a Second Amended Class Action Complaint (“SAC”) in this action on September 15, 2023 (ECF No. 17);

WHEREAS, Defendants filed a motion to dismiss the SAC on October 30, 2023 (ECF No. 18.);

WHEREAS, the Court issued an order denying Defendants’ motion to dismiss on March 13, 2024 (ECF No. 21);

WHEREAS, Defendants’ deadline to file an answer to the SAC is March 27, 2024, pursuant to Rule 12(a)(4)(A) of the Federal Rules of Civil Procedure;

WHEREAS, the Parties agree and respectfully submit that a short, two-week extension of time for Defendants to file an answer to the SAC is reasonable;

WHEREAS, this stipulation is made without prejudice to any party, in good faith, and not for purposes of delay.

NOW, THEREFORE, subject to the Court's approval, the Parties hereby stipulate and agree that Defendants' deadline to file an answer to the SAC shall be extended by two weeks, from March 27, 2024 to April 10, 2024.

IT IS SO STIPULATED.

Dated: March 27, 2024

By: *Matthew T. Kemp*

Peter R. Silverman (0001579)
Matthew T. Kemp (0093136)
SHUMAKER LOOP & KENDRICK, LLP
1000 Jackson Street
Toledo, OH 43604
Telephone: (419) 241-9000
Facsimile: (419) 241-6894
psilverman@shumaker.com
mkemp@shumaker.com

Tiana Demas (admitted *pro hac vice*)
COOLEY LLP
110 N. Wacker Drive, Ste. 4200
Chicago, IL 60610
(212) 479-6000
tdemas@cooley.com

Alexander J. Kasner (admitted *pro hac vice*)
David E. Mills (admitted *pro hac vice*)
COOLEY – WASHINGTON
Suite 700
1299 Pennsylvania Avenue, NW
Washington, DC 20004
(202) 842-7800
akasner@cooley.com
dmills@cooley.com

Kyle C. Wong (admitted *pro hac vice*)
COOLEY – SAN FRANCISCO
20th Floor
3 Embarcadero Center
San Francisco, CA 94111
(415) 693-2000
kwong@cooley.com

Attorneys for Defendants

By: Matthew R. Wilson (via email consent)

Matthew R. Wilson (0072925)
Michael J. Boyle, Jr. (0091162)
Jared W. Connors (101451)
MEYER WILSON CO., LPA
305 W. Nationwide Blvd.
Columbus, Ohio 43215
Telephone: (614) 224-6000
Facsimile: (614) 224-6066
mwilson@meyerwilson.com
mboyle@meyerwilson.com
jconnors@meyerwilson.com

Brian Levin (admitted *pro hac vice*)
LEVIN LAW, P.A.
2665 South Bayshore Drive, PH2b
Miami, FL 33133
(305) 402-9050
(305) 676-4443
brian@levinlawpa.com

*Attorneys for Plaintiffs and the
Proposed Class*

IT IS SO ORDERED

Dated: 3/28/2024

s/James G. Carr

U.S. District Judge